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January 14, 2000

VIA HAND DELIVERY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37201

In Re: *Joint Petition of TEC Companies and CAD for Approval
Of Earnings Review Settlement*


Docket No. 99-00995

Dear Mr. Waddell:

Enclosed for filing are the original and thirteen copies of the Petition for Intervention of AT&T Communications of the South Central States, Inc. in the above-referenced case. Copies are being served on the Consumer Advocate Division and on counsel for the TEC Companies.

Also enclosed is our check in the amount of \$25.00 for the filing fee.

Yours very truly,


Val Sanford

VS/ghc

Enclosures

cc: Vince Williams. Esq.
T. G. Pappas, Esq.
James P. Lamoureux
Garry Sharp

129489.1

paid
\$25.00

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

REC'D
REGULATORY
100 JAN 14
OFFICE
EXECUTIVE

IN RE: *Joint Petition of TEC Companies and CAD for Approval of
Earnings Review Settlement*

Docket No. 99-00995

PETITION FOR INTERVENTION OF AT&T
COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

AT&T Communications of the South Central States, Inc., pursuant to T.C.A. §4-5-310, submits this Petition for intervention in this matter, seeking to participate as its interests may appear, and, in support of its Petition, states that:

1. AT&T Communications of the South Central States, Inc. ("AT&T") is a Delaware corporation, authorized to do business in Tennessee, holding certificates of public convenience and necessity to operate in Tennessee intrastate commerce as both an interexchange carrier and as a competing telecommunications service provider.

2. AT&T has paid, and continues to pay, access charges to each of the TEC Companies, Crockett Telephone Company, Inc., Peoples Telephone Company and West Tennessee Telephone Company, Inc. As a result of the Megacom adjustments for 2000 filed by the TEC Companies, AT&T would pay access charges to the TEC Companies during 2000, as follows:

Crockett Telephone Company		
	<u>Element</u>	<u>Rate</u>
1	Local Transport	0.000984
2	Residual Interconnection	0.015055
3	Local Switching	0.040400
4	Information Surcharge	0.000198
5	CCL	0.023175
6	Total, One End of Access	0.079812
7	Dual Party Relay (DPR)	0.002240
8	Two ends of Access (2 x L6 + L7)	0.161864

Peoples Telephone Company		
	<u>Element</u>	<u>Rate</u>
1	Local Transport	0.001408
2	Residual Interconnection	0.015055
3	Local Switching	0.040400
4	Information Surcharge	0.000198
5	CCL	0.021085
6	Total, One End of Access	0.078146
7	Dual Party Relay (DPR)	0.002240
8	Two ends of Access (2 x L6 + L7)	0.158532

West Tennessee Telephone Company		
	<u>Element</u>	<u>Rate</u>
1	Local Transport	0.0014790
2	Residual Interconnection	0.0150550
3	Local Switching	0.0404000
4	Information Surcharge	0.0001980
5	CCL	0.0176540
6	Total, One End of Access	0.0747860
7	Dual Party Relay (DPR)	0.0022400
8	Two ends of Access (2 x L6 + L7)	0.1518120

3. The access charges of the TEC Companies are greatly in excess of the cost of providing such services. Such charges cannot be justified as necessary for the support of residential services, or for any legitimate purpose. No rational basis exists for imposing such charges. Their imposition is an arbitrary exaction from the ratepayers of AT&T, serving only as a subsidy to TEC.

4. The rate design of the proposed settlement between the TEC Companies and the Consumer Advocate Division ("CAD") ignores the fact that a substantial part of the past and projected overearnings of the TEC Companies results from such unjustified access charges, and makes no allowance for a reduction in such access charges.

5. On December 10, 1999, AT&T filed a Petition for the Convening of a Contested Case concerning the regulation of the rates of the TEC Companies, Crockett Telephone Company, Inc., Peoples Telephone Company and West Tennessee Telephone, Inc., alleging the overearnings of the TEC Companies, the unjust and unreasonable access charges of the TEC Companies, the pendency of the proposed settlement between the TEC Companies and the CAD, and seeking the convening of a contested case to consider the amount of the overearnings of the TEC Companies, the design of the rates of the TEC Companies to compensate for such overearnings and the determination of any just and reasonable rates of the TEC Companies.

6. That Petition was initially given Docket No. 99-00956, but, for reasons unknown to AT&T, it apparently has now been given Docket No. 2000-00021. AT&T filed that Petition in an effort to make sure that it would have an opportunity to participate fully in the determination of the overearnings of the TEC Companies, including the source thereof, the design of rates to compensate for such overearnings and

the determination of any just and reasonable rates for the TEC Companies. If this Petition for Intervention is granted, that Petition, Docket No. 2000-00021 should be consolidated with this proceeding.

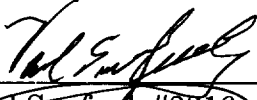
7. The legal rights, duties and other legal interests of AT&T will be determined in this proceeding. The interests of justice and the orderly and prompt conduct of the proceedings in the manner required by law will not be impaired by allowing the intervention of AT&T, as its interests may appear.

WHEREFORE, the premises considered, AT&T prays that:

1. Its Petition for intervention be granted, and it be allowed to participate in this proceeding as its interest may appear, and to receive copies of all filings, notices and orders.

2. It have such other, further and general relief as the justice of its cause may entitle it to receive.

This 14th day of January, 2000.



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Attorneys for AT&T Communications of the
South Central States, Inc.

CERTIFICATE OF SERVICE

I, Val Sanford, hereby certify that I have on this 14th day of January, 2000 served a copy of the foregoing Petition for Intervention of AT&T Communications of the South Central States, Inc. on the following persons, via First Class Mail, postage pre-paid, addressed as follows.



Val Sanford

T. G. Pappas
Bass, Berry & Sims
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Nashville, TN 37238-2700

Vincent Williams
Consumer Advocate Division
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